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9 Attorneys for Plaintiff and Cross-Defendant  
10 ACE RELOCATION SYSTEMS, INC. and  
11 Cross-Defendant ATLAS VAN LINES, INC.

12 UNITED STATES DISTRICT COURT  
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 ACE RELOCATION SYSTEMS, INC.,

16 Plaintiff,

17 v.

18 LEN SHORT; DOES 1-5,

19 Defendant.

No. C 06 3871 MEJ

STIPULATION AND [Proposed] ORDER  
EXTENDING MEDIATION  
COMPLETION DATE

Action Filed: September 28, 2005

20 AND RELATED CROSS ACTION

21 Plaintiff and Cross-Defendant Ace Relocation Systems, Inc., Cross-Defendant Atlas Van  
22 Lines, Inc., and Defendant, Cross-Complainant, and Cross-Defendant Leonard Short HEREBY  
23 STIPULATE AND AGREE as follows, and respectfully request this Court to enter its order  
24 extending the current December 19, 2006 mediation completion date through January 19, 2007.

25 On September 14, 2006, the parties submitted their Joint Case Management Statement and  
26 Proposed Case Management Order where they requested that mediation be completed within 90  
27 days of the Case Management Conference. On September 20, 2006, the Court vacated the  
28 September 21, 2006 Case Management Conference, and issued its Case Management Order. On  
October 17, 2006, the parties received notice that Steven Goldstein had been appointed mediator.

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STIPULATION & [Proposed] ORDER EXTENDING  
MEDIATION COMPLETION DATE; C-06-3871-MEJ

1288448.1

1 On October 19, 2006, Mr. Short rejected the appointment of Mr. Goldstein. On November 17,  
2 2006, David M. Bluhm was appointed as the new mediator.

3 Mr. Bluhm and counsel for the parties held an ADR conference on November 29, 2006.  
4 The parties requested that due to the delay in appointment of a new mediator, and scheduling  
5 conflicts in December, that a mediation date be set in January 2007. The parties and Mediator  
6 Bluhm agreed to mediation on January 11, 2007, with January 16, 2007 as an alternate date if  
7 further scheduling problems develop. Mediator Bluhm concurred with the proposed extension.

8 The parties have been actively engaged in settlement discussions, and believe they are  
9 close to resolving the case. The requested continuance of the mediation date also is intended to  
10 allow the parties to resolve the case without the necessity of completing the mediation.

11 Accordingly, the parties request that the Court extend the deadline for completing the  
12 mediation to no later than Friday, January 19, 2007.

13 DATED: November 29, 2006

HANSON BRIDGETT MARCUS  
VLAHOS & RUDY, LLP

14  
15 By: 

GORDON D. MCAULEY  
Attorneys for Plaintiff and Cross-  
Defendants ACE RELOCATION  
SYSTEMS, INC. and ATLAS VAN  
LINES, INC.

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17  
18  
19 DATED: November 29, 2006

MCNEAL, SILVEIRA, RICE & WILEY

20  
21 By: 

MARK J. RICE  
Attorneys for Defendant, Cross-  
Complainant and Cross-Defendant  
LEONARD SHORT

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**[Proposed] ORDER**

Pursuant to stipulation and good cause having been shown, IT IS ORDERED as follows:  
The last date to complete mediation pursuant to the Court's ADR program is continued to Friday,  
January 19, 2007.

Dated: December 8, 2006, 2006

Maria Elena James  
United States District Judge

